## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

IN RE:

\$
THE GATEWAY VENTURES, LLC,

\$ Case No. 21-30071-hcm
\$ Chapter 7

Debtor.

## NOTICE OF STIPULATION FOR AN EXTENSION OF TIME TO OBJECT OR OTHERWISE RESPOND TO WESTAR INVESTORS GROUP, LLC'S MOTION TO VACATE AMENDED AND RESTATED SPECIAL WARRANTY DEED FILED BY THE DEBTOR (RE: dkt# 502)

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

COMES NOW WESTAR INVESTORS GROUP, LLC ("Westar"), and files this Notice of Stipulation for an Extension of Time to Object or Otherwise Respond to Westar Investors Group, LLC's Motion to Vacate Amended and Restated Special Warranty Deed Filed by the Debtor (the "Motion to Vacate"; dkt# 502) and hereby gives notice that Westar, by and through its counsel, has agreed to provide proposed counsel for Michael Dixson an additional ten (10) days to object or otherwise respond to the Motion to Vacate.

The same extension applies to the Trustee and his counsel whose retention has not yet been approved.

Please take notice of the new response deadline of September 30, 2023.

WHEREFORE, WESTAR INVESTORS GROUP, LLC, prays the Court take notice of this stipulation to object or otherwise respond to Westar Investors Group, LLC's Motion to Vacate Amended and Restated Special Warranty Deed Filed by the Debtor on or before September 30, 2023, and for such other relief as is just.

**DATED** this <u>14</u> day of September, 2023.

## GORDON DAVIS JOHNSON & SHANE P.C.

4695 N. Mesa Street El Paso, Texas 79912 (915) 545-1133 (915) 545-4433 (Fax)

By:

Harrel L. Davis III State Bar No. 05567560 hdavis@eplawyers.com

Attorneys for Westar Investors Group, LLC

## **CERTIFICATE OF SERVICE**

I certify that on the  $\cancel{14}$  day of September, 2023, a true and correct copy of the above and foregoing was served upon the attached list of parties via electronic means as listed on the Court's ECF noticing system or by regular first-class mail:

Harrel L. Davis